

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS  
LIABILITY LITIGATION

MDL No. 2419  
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

CRAIG S. SIMAS,  
JOAN SIMAS  
Plaintiff(s),

v.

NEW ENGLAND COMPOUNDING  
PHARMACY INC. d/b/a NEW  
ENGLAND COMPOUNDING CENTER,  
UNIFIRST CORPORATION, A/D/B/A  
UNICLEAN CLEANROOM  
SERVICES, OCEAN STATE PAIN  
MANAGEMENT P.C., ABDUL BARAKAT,  
M.D.

Defendants

CIVIL ACTION NO. 1:13-cv-10943-RWZ

**JOINT STIPULATION FOR EXTENSION OF TIME TO FILE OPPOSITION TO  
DOCKET NO. 2390 MOTION TO DISMISS PRODUCT LIABILITY AND CONSUMER  
PROTECTION CLAIMS**

On November 6, 2015, Defendants, Abdul Barakat, M.D. and Ocean State Pain Management, P.C., (“Ocean State Parties”) filed a Motion to Dismiss Product Liability Claims and Consumer Protection Claims of the Plaintiffs (Docket No. 2390, the “Motion”). Per the Court’s MDL Order No.11 (Dkt. No. 1524), the impacted parties, the Ocean State Parties and the Plaintiffs, Joan and Craig Simas, agreed to extend the time to file a response to the Motion until **January 20, 2016.**

Dated: November 19, 2015

**Respectfully Submitted,  
CRAIG S. SIMAS and JOAN SIMAS  
By Their Attorneys,**

/s/ Timothy P. Wickstrom

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**ABDUL BARAKAT, M.D. and  
OCEAN STATE PAIN MANAGEMENT, P.C.  
By Their Attorneys,**

/s/ Sean Capplis

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**Certificate of Service**

This is to certify that on the 19<sup>th</sup> day of November, 2015 a copy of the foregoing was filed electronically. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Timothy P. Wickstrom

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Timothy P. Wickstrom